

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|-------------------------------|---|---------------------------|
| EVELYN L. MCKINLEY, | : | JURY TRIAL DEMANDED |
| | : | |
| Plaintiff, | : | Civil Action No. 04-222 E |
| | : | |
| vs. | : | |
| | : | Hon. Magistrate Judge |
| HONORABLE LES BROWNLEE, | : | Susan Baxter |
| ACTING SECRETARY OF THE ARMY, | : | |
| | : | |
| Defendant. | : | |

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME
AND EXTEND ALL DEADLINES

AND NOW, comes Plaintiff, Evelyn L. McKinley, by and through her counsel, Neal A. Sanders, Esquire, of the Law Offices of Neal A. Sanders, and files this Plaintiff's Motion for Enlargement of Time and Extend All Deadlines and states as follows:

1. Discovery is currently scheduled to end October 1, 2005.

2. There have been numerous depositions taken by the plaintiff. Plaintiff may take a few more depositions.

3. Defendant will be taking deposition of the plaintiff and some additional medical providers.

4. Counsel have discussed the need for this additional time through and until November 30, 2005 to complete discovery.

5. This additional time will not prejudice either party or the Court.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant Plaintiff's Motion for Enlargement of Time and Extend All Deadlines and execute the attached Order.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS

By:

Neal A. Sanders, Esquire
Counsel for Plaintiff,
Evelyn L. McKinley

Dated: September 13, 2005

LAW OFFICES OF

NEAL A. SANDERS

NEAL A. SANDERS*

DIRK D. BEUTH

*Admitted also in District of Columbia

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September 13, 2005

FEDERAL EXPRESS

R.V. Barth, Jr., Clerk
U.S. Post Office and Courthouse
Room 102
617 State Street
Erie, Pennsylvania 16501

RE: Evelyn L. McKinley vs. Honorable Les Brownlee, Acting
Secretary of the Army Case #04-222E
Plaintiff's Motion for Enlargement of Time and Extend all
Deadlines

Dear Mr. Barth:

Enclosed for filing please find the original, the disk and one (1) copy of the ~~enclosed~~ Motion for Enlargement of Time for the above referenced matter. Kindly date stamp the copy and return to me in the enclosed self addressed stamped envelope. Thank you.

Very truly yours,
By _____
Neal A. Sanders, Esquire

Enclosure (s)
NAS/lmk

CC: Evelyn L. McKinley
Paul Kovac, Esq.

NOT ONLINE YET